

SPS

COMMONWEALTH OF VIRGINIA
CIRCUIT COURT OF FAIRFAX COUNTY
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030
703-691-7320
(Press 3, Press 1)

Onycka Hoskie vs. Jerome Jefferson et al.

CL-2020-0020674

TO: Lambert Transfer & Storage, Inc.
Serve: Carlton Hunley III
1102 Fox Trail
Opelika AL 36801

SUMMONS – CIVIL ACTION

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the Clerk's office of this Court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment or decree against such party either by default or after hearing evidence.

APPEARANCE IN PERSON IS NOT REQUIRED BY THIS SUMMONS.

Done in the name of the Commonwealth of Virginia, on January 5, 2021.

JOHN T. FREY, CLERK

By: 

Deputy Clerk

Plaintiff's Attorney: Bradley W. Hines

2020 20674

COVER SHEET FOR FILING CIVIL ACTIONS
COMMONWEALTH OF VIRGINIACase No. _____
(CLERK'S OFFICE USE ONLY)

Fairfax County

Circuit Court

ONYCKA HOSKIE

v./In re:

JEROME JEFFERSON

PLAINTIFF(S)

DEFENDANT(S)

LAMBERT TRANSFER & STORAGE, INC.

I, the undersigned ☐ plaintiff ☐ defendant ☒ attorney for ☒ plaintiff ☐ defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

Subsequent Actions

- ☐ Claim Impleading Third Party Defendant
☐ Monetary Damages
☐ No Monetary Damages
☐ Counterclaim
☐ Monetary Damages
☐ No Monetary Damages
☐ Cross Claim
☐ Interpleader
☐ Reinstatement (other than divorce or driving privileges)
☐ Removal of Case to Federal Court

Business & Contract

- ☐ Attachment
☐ Confessed Judgment
☐ Contract Action
☐ Contract Specific Performance
☐ Detinue
☐ Garnishment

Property

- ☐ Annexation
☐ Condemnation
☐ Ejectment
☐ Encumber/Sell Real Estate
☐ Enforce Vendor's Lien
☐ Escheatment
☐ Establish Boundaries
☐ Landlord/Tenant
☐ Unlawful Detainer
☐ Mechanics Lien
☐ Partition
☐ Quiet Title
☐ Termination of Mineral Rights

Tort

- ☐ Asbestos Litigation
☐ Compromise Settlement
☐ Intentional Tort
☐ Medical Malpractice
☒ Motor Vehicle Tort
☐ Product Liability
☐ Wrongful Death
☐ Other General Tort Liability

ADMINISTRATIVE LAW

- ☐ Appeal/Judicial Review of Decision of (select one)
☐ ABC Board
☐ Board of Zoning
☐ Compensation Board
☐ DMV License Suspension
☐ Employee Grievance Decision
☐ Employment Commission
☐ Local Government
☐ Marine Resources Commission
☐ School Board
☐ Voter Registration
☐ Other Administrative Appeal

DOMESTIC/FAMILY

- ☐ Adoption
☐ Adoption - Foreign
☐ Adult Protection
☐ Annulment
☐ Annulment - Counterclaim/Responsive Pleading
☐ Child Abuse and Neglect - Unfounded Complaint
☐ Civil Contempt
☐ Divorce (select one)
☐ Complaint - Contested*
☐ Complaint - Uncontested*
☐ Counterclaim/Responsive Pleading
☐ Reinstatement - Custody/Visitation/Support/Equitable Distribution
☐ Separate Maintenance
☐ Separate Maintenance Counterclaim

WRITS

- ☐ Certiorari
☐ Habeas Corpus
☐ Mandamus
☐ Prohibition
☐ Quo Warranto

PROBATE/WILLS AND TRUSTS

- ☐ Accounting
☐ Aid and Guidance
☐ Appointment (select one)
☐ Guardian/Conservator
☐ Standby Guardian/Conservator
☐ Trust (select one)
☐ Impress/Declare
☐ Reformation
☐ Will (select one)
☐ Construe
☐ Contested

MISCELLANEOUS

- ☐ Appointment (select one)
☐ Church Trustee
☐ Conservator of Peace
☐ Marriage Celebrant
☐ Bond Forfeiture Appeal
☐ Declaratory Judgment
☐ Declare Death
☐ Driving Privileges (select one)
☐ Reinstatement pursuant to § 46.2-427
☐ Restoration - Habitual Offender or 3rd Offense
☐ Expungement
☐ Firearms Rights - Restoration
☐ Forfeiture of U.S. Currency
☐ Freedom of Information
☐ Injunction
☐ Interdiction
☐ Interrogatory
☐ Judgment Lien-Bill to Enforce
☐ Law Enforcement/Public Official Petition
☐ Name Change
☐ Referendum Elections
☐ Sever Order
☐ Taxes (select one)
☐ Correct Erroneous State/Local
☐ Delinquent
☐ Vehicle Confiscation
☐ Voting Rights - Restoration
☐ Other (please specify)

☒ Damages in the amount of \$ 1,000,000.00 are claimed.

December 10, 2020

DATE

Bradley W. Hines, VSB No. 82218

PRINT NAME

1225 Eye Street, NW, Suite 550A, Washington, DC 20005

ADDRESS/TELEPHONE NUMBER OF SIGNATOR

Tel (202) 737-4141; Fax (202) 609-9954 bhines@slocumblaw.com

FORM CC-1416 (MASTER) PAGE ONE 10/12

☐ PLAINTIFF☐ DEFENDANT☐ ATTORNEY FOR☐ PLAINTIFF☐ DEFENDANT

**"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

Civil Action Type Codes
(Clerk's Office Use Only)

Accounting	ACCT	Ejectment	EJCT
Adoption	ADOP	Encumber/Sell Real Estate	RE
Adoption – Foreign	FORA	Enforce Vendor's Lien	VEND
Adult Protection	PROT	Escheatment	ESC
Aid and Guidance	AID	Establish Boundaries	ESTB
Annexation	ANEX	Expungement	XPUN
Annulment	ANUL	Firearms Rights – Restoration	REST
Annulment – Counterclaim/Responsive Pleading..	ACRP	Forfeiture of U.S. Currency	FORF
Appeal/Judicial Review		Freedom of Information	FOI
ABC Board	ABC	Garnishment	GARN
Board of Zoning	ZONE	Injunction	INJ
Compensation Board	ACOM	Intentional Tort	ITOR
DMV License Suspension	JR	Interdiction	INTD
Employment Commission	EMP	Interpleader	INTP
Employment Grievance Decision	GRV	Interrogatory	INTR
Local Government	GOVT	Judgment Lien – Bill to Enforce	LIEN
Marine Resources	MAR	Landlord/Tenant	LT
School Board	JR	Law Enforcement/Public Official Petition	LEP
Voter Registration	AVOT	Mechanics Lien	MECH
Other Administrative Appeal	AAPL	Medical Malpractice	MED
Appointment		Motor Vehicle Tort	MV
Conservator of Peace	COP	Name Change	NC
Church Trustee	AOCT	Other General Tort Liability	GTOR
Guardian/Conservator	APPT	Partition	PART
Marriage Celebrant	ROMC	Petition – (Miscellaneous)	PET
Standby Guardian/Conservator	STND	Product Liability	PROD
Asbestos Litigation	AL	Quiet Title	QT
Attachment	ATT	Referendum Elections	ELEC
Bond Forfeiture Appeal	BFA	Reinstatement (Other than divorce or driving	
Child Abuse and Neglect – Unfounded Complaint ..	CAN	privileges)	REIN
Civil Contempt	CCON	Removal of Case to Federal Court	REM
Claim Impleading Third Party Defendant –		Separate Maintenance	SEP
Monetary Damages/No Monetary Damages	CTP	Separate Maintenance – Counterclaim/Responsive	
Complaint – (Miscellaneous)	COM	Pleading	SCRP
Compromise Settlement	COMP	Sever Order	SEVR
Condemnation	COND	Taxes	
Confessed Judgment	CJ	Correct Erroneous State/Local	CTAX
Contract Action	CNTR	Delinquent	DTAX
Contract Specific Performance	PERF	Termination of Mineral Rights	MIN
Counterclaim – Monetary Damages/No Monetary		Trust – Impress/Declare	TRST
Damages	CC	Trust – Reformation	REFT
Cross Claim	CROS	Unlawful Detainer	UD
Declaratory Judgment	DECL	Vehicle Confiscation	VEH
Declare Death	DDTH	Voting Rights – Restoration	VOTE
Detinue	DET	Will Construction	CNST
Divorce		Will Contested	WILL
Complaint – Contested/Uncontested	DIV	Writs	
Counterclaim/Responsive Pleading	DCRP	Certiorari	WC
Reinstatement – Custody/Visitation/Support/		Habeas Corpus	WHC
Equitable Distribution	CVS	Mandamus	WM
Driving Privileges		Prohibition	WP
Reinstatement pursuant to § 46.2-427	DRIV	Quo Warranto	WQW
Restoration – Habitual Offender or		Wrongful Death	WD
3 rd Offense	REST		

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

ONYCKA HOSKIE
4509 Hamilton Drive
Dale City, Virginia 22193

Plaintiff,

v.

JEROME JEFFERSON
4013 Flowers Street
Adamsville, AL 35005

and

LAMBERT TRANSFER & STORAGE, INC.
1102 Fox Trail
Opelika, Alabama 36801

Serve: Carlton Hunley
1102 Fox Trail
Opelika, AL 36801

Defendant.

Case No.: **2020 20674**

FILED
CIVIL INTAKE
2020 DEC 28 P 1:00
JULIE FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

COMPLAINT

COMES NOW the Plaintiff, Onycka Hoskie, through counsel, and as and for her cause of action against the Defendants, Jerome Jefferson and Lambert Transfer & Storage, Inc., states as follows:

COUNT I

(Negligence Causing Personal Injuries Against Jerome Jefferson)

1. On or about June 22, 2020, Plaintiff Onycka Hoskie was operating a motor vehicle on westbound Furnace Road, at or near its intersection with Richmond Highway, in Fairfax County, Virginia. On the same date and time, Defendant Jerome Jefferson was operating

a motor vehicle on southbound Richmond Highway, at or near its intersection with Furnace Road, in Fairfax County, Virginia. Suddenly and without warning, as he attempted to make a left turn onto eastbound Furnace Road, Defendant Jefferson negligently crossed over the double-yellow highway dividing lines and drove his vehicle into the Plaintiff's vehicle, thereby causing a collision, and further causing the Plaintiff to sustain serious personal injuries. The Plaintiff neither caused nor contributed to the collision or her injuries.

2. Defendant Jefferson failed to pay full time and attention to the operation of his vehicle, failed to maintain right of center, failed to yield to the right-of-way, failed to operate his vehicle at a reasonable speed, failed to brake timely, failed to reduce his speed to avoid a collision, failed to control his vehicle, failed to see what was there to be seen, and operated his vehicle recklessly and with a reckless disregard for the consequences of such operation, and with a disregard for the rights and safety of the Plaintiff and others, and in a manner likely to endanger the person and property of the Plaintiff and others.

3. Defendant Jefferson operated his automobile in violation of the motor vehicle and traffic laws of the Commonwealth of Virginia. It was the duty of Defendant Jefferson to operate his vehicle in a careful and prudent manner with due regard for the safety of other persons; notwithstanding that duty, Defendant Jefferson operated his vehicle in a negligent manner, with a disregard for the safety of the Plaintiff.

4. As a direct and proximate result of the negligence of the Defendant as aforesaid, the Plaintiff has suffered, and will continue to suffer, severe and permanent physical injuries, disability, great pain and suffering, and great mental anguish and emotional distress.

5. As a further result of the negligence of the Defendant as aforesaid, the Plaintiff has incurred substantial medical and related expenses, loss of earnings, loss of employment opportunity, transportation costs, and loss of time and enjoyment from her usual and customary leisure and recreational activities.

WHEREFORE, the Plaintiff demands judgment from and against Defendant Jerome Jefferson in the amount of One Million Dollars (\$1,000,000) in compensatory damages, plus interest, costs, and such further relief as the Court may find just and reasonable.

COUNT II

(Vicarious Liability/*Respondeat Superior* Against Lambert Transfer & Storage, Inc.)

6. The Plaintiff adopts and incorporates by reference herein the allegations set forth in Paragraphs 1 through 5 of the Complaint.

7. At all times relevant to this action, Defendant Jerome Jefferson was working as an employee or agent for Defendant Lambert Transfer & Storage, Inc. (hereinafter "Lambert"). Defendant Lambert is therefore vicariously liable for the aforesaid negligence of Defendant Jefferson and damages to the Plaintiff under the doctrine of *respondeat superior*.

WHEREFORE, the Plaintiff, Onycka Hoskie, demands judgment from and against Defendant Lambert Transfer & Storage, Inc. in the amount of One Million Dollars (\$1,000,000) in compensatory damages, plus interest from the date of the accident, and costs.

JURY DEMAND

8. The Plaintiff hereby demands a trial by jury on all issues herein.

ONYCKA HOSKIE

By: 
Bradley W. Hines (VSB No. 82218)

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